

**REMARKS**

Applicants acknowledge the receipt of the Office Action dated 1 July 2005 in which the Examiner:

- 1) rejected claims 1-26 under 35 U.S.C. 102(a) as being anticipated by *Tanizaki et al* (US Pat. Pub. No. 2003/0068173).

**A. Rejections under 35 U.S.C. 102(a)**

The Examiner has rejected claims 1-26 under 35 U.S.C. 102(a) as being anticipated by *Tanizaki et al* (US Pat. Pub. No. 2003/0068173). Applicants claimed invention is directed to an image forming device having a main body and a movable subunit. The subunit is moveable between a first orientation and a second orientation. A developer member is positioned within the main body, and a photoconductive member is positioned on the subunit. In the first orientation, the developer member and the photoconductive member are spaced apart. In the second orientation, the photoconductive member is positioned relative to the developer member for forming a toner image. The photoconductive member remains positioned on the subunit in both orientations. *Tanizaki* does not teach or suggest this limitation.

*Tanizaki* is directed to an image forming device having a main unit and a pivoting door moveable between a first position and a second position. Both photoconductor members and developing members are mounted within the main unit and remain within the main unit regardless of the position of the door. *Tanizaki* does not disclose mounting the photoconductive member to the door.

Applicants independent claims 1, 9, 14, 16, and 18 each require the image forming device with the photoconductive member mounted on the subunit. In addition, each claim requires the subunit be movable between a first orientation with the photoconductive member spaced away from the developer member, and a second orientation with the photoconductive member either positioned in contact with or closely located to the developer member for image formation. The photoconductive member remains mounted on the subunit in both orientations. *Tanizaki* does not disclose this structure. Applicants therefore submit *Tanizaki* cannot anticipate independent claims 1, 9, 14, 16, and 18, and dependent claims 2-8, 10-13, 15, 17, and 19.

Applicants independent claims 20, 23, and 25 each require a method of forming an image include the step of mounting a photoconductive member on a subunit. In addition, each claim requires the subunit is movable between a first orientation that is spaced away from the main body, and a second orientation that is adjacent to the main body for image formation. The photoconductive member remains mounted on the subunit in both orientations. *Tanizaki* does not disclose these methods and cannot anticipate the claimed combination. Therefore, Applicants independent claims 20, 23, and 25 and claims 21-22, 24, and 26 depending therefrom are allowable over the prior art of record.

Applicants therefore submit each of the claims is patentable over the cited prior art. Having addressed each of the claims and having provided arguments in favor of allowance, Applicants feel the claims are in condition for allowance. If any issues

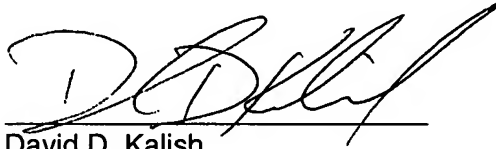
remain unresolved, the attorney referenced below would welcome a telephone conference to expedite allowance and issuance.

Respectfully submitted,

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Dated: \_\_\_\_\_

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